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**From:** Kathleen M. Roberts [kroberts@lawbc.com]  
**Sent:** 7/15/2019 3:58:56 PM  
**To:** Hasan, Jafrul [Hasan.Jafrul@epa.gov]  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

I hope we can find an agreeable resolution quickly.

FYI –one of the reports requested is 1,474 pages and the other is 2,196 pages.

**KATHLEEN M. ROBERTS**  
**VICE PRESIDENT**  
**B & C CONSORTIA MANAGEMENT LLC**  
2200 Pennsylvania Avenue, N.W. Suite 100W | Washington, D.C. 20037  
T: 202-833-6581 | F: 202-557-3836 | bc-cm.com

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**From:** Hasan, Jafrul <Hasan.Jafrul@epa.gov>  
**Sent:** Monday, July 15, 2019 11:58 AM  
**To:** Kathleen M. Roberts <kroberts@lawbc.com>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Kathleen- It was a pleasure speaking with you. Based on our discussion, I will check with Scott Sherlock and get back to you.

Thanks for your help with this issue!!

Regards,

Jafrul Hasan, PhD, MPH, MS (Microbiologist)  
Chief, Assessment Branch III  
Risk Assessment Division/OPPT/EPA  
1200 Pennsylvania Ave, NW (MC 7403M)  
Washington, DC 20460  
WJC East, Room 6334AA  
Phone: Desk: 202-564-9686  
Mobile: 202-577-9701  
Fax: 202-564-7450

Deliveries: Room 6334AA, WJC East, 1201 Constitution Ave., NW, Washington, DC 20460

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**From:** Kathleen M. Roberts <kroberts@lawbc.com>  
**Sent:** Wednesday, July 03, 2019 12:03 PM  
**To:** Hasan, Jafrul <Hasan.Jafrul@epa.gov>; Sheehan, Eileen <Sheehan.Eileen@epa.gov>  
**Cc:** Sherlock, Scott <Sherlock.Scott@epa.gov>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Next week will be difficult as I am on travel most of the week.

The following week (July 15 – 19) would be better. I am available anytime between 8:00 a.m. and 3:30 p.m. (EDT) any day - except the morning of Tuesday, July 16.

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**From:** Hasan, Jafrul <[Hasan.Jafrul@epa.gov](mailto:Hasan.Jafrul@epa.gov)>  
**Sent:** Tuesday, July 2, 2019 12:17 PM  
**To:** Kathleen M. Roberts <[kroberts@lawbc.com](mailto:kroberts@lawbc.com)>; Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto:Sheehan.Eileen@epa.gov)>  
**Cc:** Sherlock, Scott <[Sherlock.Scott@epa.gov](mailto:Sherlock.Scott@epa.gov)>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Hi Kathleen-Thanks for your gracious consideration for a quick discussion while still on vacation! I wish to include Scott Sherlock, the Attorney-Advisor for our program office, to join the call as well. In an effort to find a mutually convenient time for all three of us, please advise what time/option would work for you. I can then send an invitation!

Look forward to....

Thanks.

Regards,

Jafrul Hasan, PhD, MPH, MS  
Chief, Assessment Branch III  
Risk Assessment Division/OPPT/EPA  
1200 Pennsylvania Ave, NW (MC 7403M)  
Washington, DC 20460  
WJC East, Room 6334AA  
Phone: Desk: 202-564-9686  
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**From:** Kathleen M. Roberts <[kroberts@lawbc.com](mailto:kroberts@lawbc.com)>  
**Sent:** Tuesday, July 02, 2019 11:07 AM  
**To:** Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto:Sheehan.Eileen@epa.gov)>  
**Cc:** Hasan, Jafrul <[Hasan.Jafrul@epa.gov](mailto:Hasan.Jafrul@epa.gov)>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Thanks. I am vacation this week but I will try to find some time today to call Jafrul

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**From:** Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto:Sheehan.Eileen@epa.gov)>  
**Sent:** Tuesday, July 2, 2019 11:06 AM

**To:** Kathleen M. Roberts <[kroberts@lawbc.com](mailto: kroberts@lawbc.com)>  
**Cc:** Hasan, Jafrul <[Hasan.Jafrul@epa.gov](mailto: Hasan.Jafrul@epa.gov)>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Kathleen,

A call makes sense to clarify what options there are. Thank you! The best EPA point of contact for the call is:

Jafrul Hasan, PhD, MPH, MS (Microbiologist)  
Chief, Assessment Branch III  
Risk Assessment Division/OPPT/EPA  
1200 Pennsylvania Ave, NW (MC 7403M)  
Washington, DC 20460  
WJC East, Room 6334AA  
Phone: Desk: 202-564-9686  
Mobile: 202-577-9701  
Fax: 202-564-7450

Others to include are: [Oxendine.sharon@epa.gov](mailto: Oxendine.sharon@epa.gov), [Sheehan.eileen@epa.gov](mailto: Sheehan.eileen@epa.gov), [sherlock.scott@epa.gov](mailto: sherlock.scott@epa.gov),  
[thaler.elizabeth@epa.gov](mailto: thaler.elizabeth@epa.gov)

Thank you,  
Eileen Sheehan  
415.972.3287

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**From:** Kathleen M. Roberts <[kroberts@lawbc.com](mailto: kroberts@lawbc.com)>  
**Sent:** Tuesday, July 2, 2019 4:33 AM  
**To:** Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto: Sheehan.Eileen@epa.gov)>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Eileen

I did get your voice mail but I do not think you answered my question. Does EPA plan to post the unpublished study reports in the docket – or is EPA simply looking to have the reports available for staff's reference?

If we need to talk about this, I can try to arrange to call you later this week.

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**From:** Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto: Sheehan.Eileen@epa.gov)>  
**Sent:** Monday, July 1, 2019 1:36 PM  
**To:** Kathleen M. Roberts <[kroberts@lawbc.com](mailto: kroberts@lawbc.com)>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Hi Kathleen,  
I tried to call you as it may be simpler to clarify over the phone. I can be reached at 415.972.3287.

As to the plans, we want to ensure that EPA's upcoming draft risk evaluation and future decisions are based on all available data. EPA wants to have the original information for any studies, published or unpublished, that are cited in our risk evaluation. As part of our TSCA work on N-methylpyrrolidone (NMP), EPA cited the unpublished reports in the

problem formulation, and we want to be sure we have the underlying reports. As you know, the two unpublished reports are cited in various studies and reports including Annex XV Restriction Report Proposal for a Restriction (9 August 2013) and *Quantitative Risk Analysis for N-Methyl Pyrrolidone Using Physiologically Based Pharmacokinetic and Benchmark Dose Modeling* (Poet et al 2009) and others.

Does that help?

Please call at your convenience. I hope you received my voicemails; I have several different numbers for you?

Best,  
Eileen Sheehan  
Senior Policy Advisor  
Existing Chemicals Branch, CCD, OPPT, OCSPP  
415.972.3287

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**From:** Kathleen M. Roberts <[kroberts@lawbc.com](mailto:kroberts@lawbc.com)>  
**Sent:** Monday, July 1, 2019 4:25 AM  
**To:** Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto:Sheehan.Eileen@epa.gov)>; Kathleen M. Roberts <[kroberts@bc-cm.com](mailto:kroberts@bc-cm.com)>  
**Subject:** RE: Trying to track down two unpublished NMP reports.....

Eileen

What are the plans for these study reports? These were two very expensive studies sponsored by the NMP Producers Group and are quite valuable from a data compensation standpoint. As such, the members would not want the reports posted in an EPA docket in which it becomes publicly available to anyone.

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**From:** Sheehan, Eileen <[Sheehan.Eileen@epa.gov](mailto:Sheehan.Eileen@epa.gov)>  
**Sent:** Friday, June 28, 2019 2:02 PM  
**To:** Kathleen M. Roberts <[kroberts@bc-cm.com](mailto:kroberts@bc-cm.com)>  
**Subject:** Trying to track down two unpublished NMP reports.....

Hi Kathleen,

I hope this finds you well! I work for EPA's TSCA program in the Existing Chemicals Branch. I believe we met previously in a meeting on NMP at EPA HQ a year or so ago. I am helping our Risk Assessment Division track down two 1999 unpublished studies on NMP. I would greatly appreciate your help and guidance as to how to track down the reports. I am happy to make calls, but I spoke with Doug Parsons and he thought it best to start with you. The two studies are:

- NMP Producers Group (1999b). N-Methylpyrrolidone (NMP): Two generation reproduction toxicity study in Wistar rats - Administration in the diet. Department of Toxicology of BASF Aktiengesellschaft, Ludwigshafen, Germany, Project No. 70R0056/97008, unpublished report.
- NMP Producers group (1999c). Two-generation reproduction toxicity study with N-Methylpyrrolidone (NMP) in Sprague-Dawley rats - Administration in the diet. Huntingdon Life Science, East Millestone, NJ, USA, project No.: 97-4106, unpublished report.

Again, I am happy to make calls to try to track down if you have suggestions as to where we might focus our efforts. Thank you in advance for any assistance you can provide! Don't hesitate to call me at 415.972.3287.

Best to you!

Eileen Sheehan

Senior Policy Advisor

EPA Region 9 Land Division on detail to OCSPP/OPPT/CCD/Existing Chemicals Branch

415.972.3287

[Sheehan.eileen@epa.gov](mailto:Sheehan.eileen@epa.gov)